## REMARKS

Reconsideration and allowance of the above-referenced application are respectfully requested.

Claims 1-30 stand rejected under 35 USC 103 as allegedly being unpatentable over Balakrishnan in view of Scott et al.

As stated in previous amendments, the way in which Balakrishnan handles the different grammars is entirely different than the way the grammars are handled by the presently claimed system. However, the points made in response to argument are well taken with regards to the previous claims. In response, the claims are amended to emphasize their patentable distinctions.

Referring to Claim 1 as representative, the claims recite that when the system determines a change in the information (where the information represents which of a plurality of applications is being used), the method operates to load a first grammar for a first application, and to load a second different grammar for a second application and unloading the first grammar. In rejecting Claim 8, the rejection states that it "would have been obvious" to unload the first grammar "so that the speech recognizer would not have to consider irrelevant commands". However, this contention is based on hindsight, and not based on the teaching of the cited prior art. Moreover, the

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contention that it would be obvious to modify Balakrishnan to unload the language models goes against the teaching of Balakrishnan. In fact, Balakrishnan could not operate as described if it were modified in this way.

Balakrishnan teaches that the first and second vocabularies 44 and 46 and the first and second language models 48 and 50 are stored in the memory. See for example column 3 lines 31-35. In operation, when the user speaks a command, the "applets" 33 and 37 form a score for the recognition based on each of the language models. If one of those language models were unloaded, it could never form such a score. See, generally, column 4 lines 29-37. The arbitrator determines that the application which provides the highest score will receive the input speech and act on it. See column 4 lines 38-40.

The rejection alleges that Balakrishnan could be modified to unload a grammar. However, if the grammar were unloaded, then Balakrishnan could not use the arbitrator at all, and could not operate in the way described above. Putting this another way, if Balakrishnan were modified to do the things now defined by Claim 1, than Balakrishnan could not operate according to our specified teaching.

The hypothetical combination of Balakrishnan in view of Scott et al., therefore, still would not teach unloading the

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first grammar and loading a second grammar when detecting a change.

Moreover, the subject matter now defined by Claim 1 produces an advantage. Any physical system has a finite amount of resources. Especially when speech detection is being carried out, the amount of total resources that are applied to a speech problem can greatly affect the recognition capability of the speech. The subject matter of Claim 1 determines an application, unloads one grammar and reloads the other grammar, and hence can allow more effective resources to be used with the more important grammar.

Therefore, Claim 1 should be allowable along with the claims that depend therefrom. Each of the remaining claims in the case has been amended in an analogous way.

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as
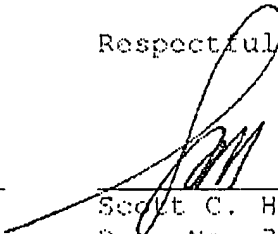
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specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Applicants ask that all claims be allowed.  No fee is believed to be due, however please apply any applicable charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

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Scott C. Harris
Reg. No. 32,030

Fish & Richardson P.C.
Attorneys for Intel Corporation
PTO Customer No. 20985
12390 El Camino Real
San Diego, California 92130
(858) 678-5070 telephone
(858) 678-5099 facsimile

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